

# EXHIBIT 11

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS DIVISION**

<b>IN RE DEPAKOTE CASE:</b>	:	
	:	
<b>A.S., a minor, by Marthee Sansone, individually as parent and next friend of A.S.</b>	:	<b>Case No. 12-cv-52-NJR-SCW</b>
	:	<b>LEAD CONSOLIDATED CASE</b>
	:	
<b>Plaintiffs</b>	:	<b>Case No. 17-CV-793-NJR-SCW</b>
	:	
<b>vs.</b>	:	
	:	
<b>ABBOTT LABORATORIES, INC.,</b>	:	
	:	
<b>Defendants</b>	:	
	:	

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**PLAINTIFF'S EXPERT AND NON-RETAINED EXPERT DISCLOSURES**  
**PURSUANT TO RULE 26(a)**

**PLEASE TAKE NOTICE** that pursuant to Federal Rule of Civil Procedure 26(a)(2)(A), Plaintiffs identify the following expert witnesses to testify at trial in the above-captioned case on their behalf.

**PLEASE TAKE FURTHER NOTICE**, that a signed Report for each retained expert, accompanies this disclosure, in compliance with Rule 26(a)(2)(B).

**PLEASE TAKE FURTHER NOTICE** that pursuant to Federal Rule of Civil Procedure 26(a)(2)(C), Plaintiffs identify the following non-retained expert witnesses whom they may call to offer expert testimony:

**NON-RETAINED EXPERTS:**

1. Dr. Jeffrey Marsh  
St. Louis, MO

Dr. Marsh may be called to testify regarding his care, treatment, diagnosis, condition, and prognosis of Anthony Sansone. He may testify to any opinion expressed in his deposition.

2. Dr. Tyler Reimschisel  
Nashville, Tennessee

Dr. Reimschisel may be called to testify regarding his care, treatment, diagnosis, condition, and prognosis of Anthony Sansone. He may testify to any opinion expressed in his deposition.

3. Dr. Patti Nemeth  
Rio Rancho, New Mexico

Dr. Nemeth may be called to testify regarding her care, treatment, diagnosis, and condition and prognosis of Marthee Sansone. She may testify to any opinion expressed in her deposition.

**RETAINED EXPERTS:**

The following are the retained experts plaintiffs may call to testify at trial, either live or by video deposition, and their availability for deposition. Pursuant to Rule 26(a)(2)(B), an expert report is being produced for each of the following named experts.

1. Godfrey P. Oakley, Jr., M.D., MSPM
2. Linda A. Motyka, Ph.D.
3. Nathaniel Robin, M.D.
4. Jaishree Capoor, M.D.

/s/ Amanda S. Williamson  
W. Lewis Garrison  
Kathryn S. Harrington  
Amanda S. Williamson  
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***Attorneys for Plaintiffs***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 29, 2017, a copy of the foregoing was served on counsel for defendant, Abbott Laboratories.

/s/Amanda S. Williamson  
Amanda S. Williamson